

## Special\* Draft Sea Level Rise Guidance Comments for North Central Coast District Staff

Bill McLaughlin [REDACTED]

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To:

[CoastalSLRGuidanceDocument](#)

Saturday, February 01, 2014 6:33 PM

You replied on 2/5/2014 4:08 PM.

Dear California Coastal Commission North Central Coast Field Staff,

The Surfrider Foundation San Francisco Chapter would like comment on the Draft Sea Level Rise Guidance Policy. There were several areas in the document that relate to our campaign to restore the beach here in San Francisco near the Sloat Blvd. area. However, we would like to point out two issues in particular for comment:

1. San Francisco's Local Coastal Program is long overdue for an update. Naturally, the Ocean Beach Master Plan and the current Sea Level Rise Guidance will need to weigh heavily in this process. We just want to encourage local field staff to work with the City to get this moving as soon as possible.

2. Regarding the principles section on page 25 the guidance reads:

**10. Maximize natural shoreline values and processes and embrace green infrastructure and living shorelines; avoid the perpetuation of shoreline armoring.**

*If existing development (both private and public) is threatened by sea-level rise hazards, it should employ the least environmentally damaging feasible alternatives and minimize hard shoreline protection. Priority should be given to options that enhance and maximize coastal resources and access, including innovative nature-based approaches such as living shoreline techniques or managed/planned retreat. In some situations, protection of existing structures may include the use of traditional hard shoreline protection devices (as permitted by the Coastal Act under certain conditions). If shoreline protection is necessary and allowable under the Coastal Act, use the least-environmentally damaging alternative, incorporate projections of sea-level rise into the design of protection, and limit the time-period of approval, for example, to the life of the structure the device is protecting. Major renovations, redevelopment, or other new development should not rely upon existing shore protective devices for site stability or hazard protection. When feasible, existing shoreline protection that is no longer needed should be phased out.*

We wholeheartedly agree with the above statement, and believe the current design of the SPUR Ocean Beach Master Plan solution for Sloat embodies these principles. However, one aspect of the

guidance that we feel should especially influence the outcome for Sloat is the principle above that states “if shoreline protection is necessary and allowable, use the least environmentally damaging alternative, incorporate projections of sea-level rise into the design of protection, and limit the time of approval to the life of the structure the device is protecting.” We understand that some amount of traditional armoring may eventually be included in the final permitted project at Sloat. We just believe these principles need to be kept front and center for any protective device that is proposed along the way. In this light, we highly urge the Commission to ensure that the SPUR team considers the alternative of re configuring the Lake Merced tunnel so that it lies in the most landward position possible. Such an option would bring the longest term protection of both the wastewater infrastructure AND our beach from sea level rise. The Commission should know, perhaps most significantly, the preliminary costs of tunnel re-alignment/reconfiguration are close to the cost of armoring the Lake Merced Tunnel in its current place (approximately \$200 million). In the past, the City has rejected Tunnel relocation due to cost. We hope such an argument is now moot. Regardless, we urge the Commission to ensure these facts are considered in the decision making process by our public agencies.

Thank you.

Sincerely,

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Bill McLaughlin  
Surfrider Foundation, San Francisco Chapter  
Restore Sloat Campaign Manager



<http://www.sloaterosionob.blogspot.com>